

WHITEHEAD DECLARATION
EXHIBIT K

Bruce Scott, Jr.

December 9, 2019

Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK NWAUZOR,)
FERNANDO AGUIRRE-URBINA,)
individually and on behalf of all)
those similarly situated,)
Plaintiffs,)
vs.) No. 17-cv-05769-RJB
THE GEO GROUP, INC., a Florida)
corporation,)
Defendant.)

Videotaped
Deposition Upon Oral Examination of
BRUCE A. SCOTT JR.

9:39 a.m.
Monday, December 9, 2019
1019 Regents Blvd., Suite 204
Fircrest, Washington

REPORTED BY: Keri A. Aspelund, RPR, CCR No. 2661

Bruce Scott, Jr.

December 9, 2019

Page 17

1 Q. Would you ever contact ICE on your own accord
2 about contract compliance issues?

3 A. No.

4 Q. All right, so this was always ICE contacting you
5 to make sure that GEO was in compliance?

6 MS. MELL: Object to the form.

7 A. ICE never contacted me directly. I would get
8 communications through the facility administrators.

9 Q. And who are the facility administrators?

10 A. There are lots of facilities. For example,
11 Stephen Langford is the facility administrator at the
12 Northwest ICE Processing Center.

13 Q. And I hear you saying the Northwest ICE
14 Processing Center; is that the term that you're using?

15 A. Yes.

16 Q. Okay. And that refers to what was previously
17 known as the Northwest Detention Center?

18 A. Previously known as Northwest Detention Center.

19 Q. When was the name change made?

20 A. Name change was made, I don't remember the exact
21 date, but sometime late last year --

22 Q. Do you know what prompted the change?

23 A. -- or this year. This is December.

24 Q. I don't know what prompted the change.

25 A. And tell me, how do you know that the name

Bruce Scott, Jr.

December 9, 2019

Page 81

1

C-E-R-T-I-F-I-C-A-T-E

2

3 STATE OF WASHINGTON)

4) ss.

5 COUNTY OF THURSTON)

6

I, the undersigned Registered Professional
7 Reporter and Certified Court Reporter, hereby
certify that the foregoing deposition upon oral
8 examination was taken stenographically before me and
transcribed under my direction;

9

10 That the witness was duly sworn by me,
pursuant to RCW 5.28.010, to testify truthfully; that the
11 transcript of the deposition is a full, true, and correct
transcript to the best of my ability; that I am neither
12 attorney for, nor a relative or employee of, any of the
parties to the action or any attorney or counsel employed
13 by the parties hereto, nor financially interested in its
outcome.

14

15 I further certify that in accordance with CR
30(e), the witness was given the opportunity to examine,
16 read, and sign the deposition, within 30 days, upon its
completion and submission, unless waiver of signature was
17 indicated in the record.

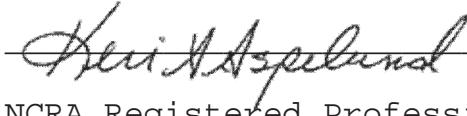
18

IN WITNESS WHEREOF, I have hereunto set
my hand this 19th day of December, 2019.

20

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NCRA Registered Professional Reporter
Washington Certified Court Reporter No. 2661

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